

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

TORION SELLERS, RENEE BELL,
and KEITH RUSSELL, Individually,
and on behalf of all Others Similarly
Situated,

Plaintiffs,

v.

SAGE SOFTWARE INC. d/b/a
SAGE North America; and PAYA,
INC. f/k/a SAGE PAYMENT
SOLUTIONS, INC.,

Defendants.

CIVIL ACTION NO.
1:17-cv-03614-ELR-JSA

**JOINT MOTION FOR APPROVAL OF FLSA COLLECTIVE ACTION
SETTLEMENT AGREEMENT AND DISMISSAL OF CASE WITH
PREJUDICE**

Plaintiffs TORION SELLERS, RENEE BELL, and KEITH RUSSELL (“Plaintiffs”) and Defendants SAGE SOFTWARE, INC.¹ (“SSI”) and PAYA, INC. f/k/a Sage Payment Solutions, Inc. (“Paya” and with SSI, “Defendants”) (Plaintiffs and Defendants collectively referred to as the “Parties”) by and through their undersigned counsel, and jointly move that the Court approve the Parties’ settlement in accordance with applicable law and dismiss this matter, with

¹ Improperly named in the Action as Sage Software Inc. d/b/a Sage North America.

prejudice. In support of this Motion, the Parties submit the accompanying Memorandum of Law and incorporate it herein by reference.

WHEREFORE, the Parties respectfully request the Court grant this Motion and enter the Proposed Order: (1) approving the Parties' settlement agreement; (2) dismissing this action with prejudice; and (3) retaining jurisdiction over this case to enforce the Parties' settlement agreement.

Respectfully submitted this 14 th day of January, 2019.

/s/ Mitchell L. Feldman

Mitchell L. Feldman, Esq.

Georgia Bar No. 255791

mitch@feldmanwilliams.com

Benjamin L. Williams (Admitted *pro hac vice*)

ben@feldmanwilliams.com

FELDMAN WILLIAMS PLLC

1201 N. Peachtree Street, N.E.

400 Colony Square, #200

Atlanta, GA 30361

Telephone: 813.636.9366

Facsimile: 813.639.9376

Charles Ronald Bridgers

Georgia Bar No.

charlesbridgers@dcbflegal.com

Mitchell Douglas Benjamin

Georgia Bar No.

benjamin@dcbflegal.com

**DELONG CALDWELL BRIDGERS
FITZPATRICK & BENJAMIN, LLC**

101 Marietta Street, NW

3100 Centennial Tower

Atlanta, GA 30303

Telephone: 404.979.3150

Facsimile: 404.979.3157

Attorneys for Plaintiffs

/s/ Anne M. Mellen

Anne M. Mellen

Georgia Bar No. 558694

AMellen@littler.com

Angelo Spinola

Georgia Bar No. 672191

ASpinola@littler.com

Rachel P. Kaercher

Georgia Bar No. 743007

rkaercher@littler.com

LITTLER MENDELSON, P.C.

3344 Peachtree Road N.E.

Suite 1500

Atlanta, GA 30326

Telephone: 404.233.0330

Facsimile: 404.233.2361

Lauren E. Schwartzreich (Admitted *pro hac vice*)

lschwartzreich@littler.com

LITTLER MENDELSON, P.C.-NY

8th Floor

900 Third Avenue

New York, NY 10022

Telephone: 212.583.9600

Facsimile: 212.832.2719

Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

TORION SELLERS, RENEE BELL,
and KEITH RUSSELL, Individually,
and on behalf of all Others Similarly
Situated,

Plaintiffs,

v.

SAGE SOFTWARE INC. d/b/a
SAGE North America; and PAYA,
INC. f/k/a SAGE PAYMENT
SOLUTIONS, INC.,

Defendants.

CIVIL ACTION NO.
1:17-cv-03614-ELR-JSA

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of January, 2019, the proceeding **JOINT MOTION FOR APPROVAL OF FLSA COLLECTIVE ACTION SETTLEMENT AGREEMENT AND DISMISSAL OF CASE WITH PREJUDICE** was filed electronically through the ECF system, is available for viewing and downloading from the ECF system and will be sent electronically to the registered participants identified on the Notice of Electronic Filings, including Plaintiffs' counsel of record as follows:

Angelo Spinola, Esq.
aspinola@littler.com

Anne M. Mellen
amellen@littler.com

Rachel P. Kaercher
rkaercher@littler.com

Lauren E. Schwartzreich
lschwartzreich@littler.com

/s/ Mitchell L. Feldman

MITCHELL L. FELDMAN

Georgia Bar No. 257791

FELDMAN WILLIAMS PLLC

1201 Peachtree Street, NE

400 Colony Square #200

Atlanta, GA 30361

Tele: (813) 639-9366

Fax: (813) 639-9376

Email: mitch@feldmanwilliams.com

Counsel for Plaintiffs